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Attorneys for Defendants
Samsung Electronics America, Inc.
and Samsung Electronics Co., Ltd.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JEFF WESKE, JO ANNA FRAGER,
DARRYL MYHRE, RALPH CHERMAK,
JEFF POLSEAN, MAUREEN KEAN and
BEVERLY BURNS, on behalf themselves and
all others similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,
INC. AND SAMSUNG ELECTRONICS CO.,
LTD.,

Defendants

Civil Action No. 2:10-cv-04811 (WJM)

**NOTICE OF MOTION TO
DISMISS PLAINTIFFS' SECOND
AMENDED COMPLAINT AND
TO STRIKE PLAINTIFFS'
CLASS ALLEGATIONS**

Motion Return Date: August 6, 2012

ORAL ARGUMENT REQUESTED

TO: James E. Cecchi, Esq.
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PLEASE TAKE NOTICE that on August 6, 2012 at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, attorneys for defendants Samsung Electronics America, Inc. and Samsung Electronics Company, Ltd. (collectively "Samsung") shall apply to the United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building and United States Courthouse, 50 Walnut Street, Newark, New Jersey for an Order of the Court pursuant to Fed. R. Civ. P. 12(b)(6) and Fed. R. Civ. P. 9(b) granting Samsung's motion to dismiss Plaintiffs' Second Amended Complaint and striking Plaintiffs' class allegations pursuant to Fed. R. Civ. P. 23.

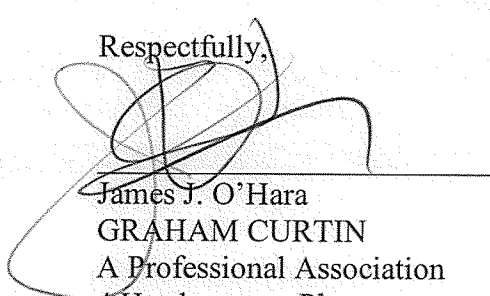
PLEASE TAKE FURTHER NOTICE that, in support of this motion, Samsung will rely on the supporting Brief and Affirmation of Counsel submitted herewith, together with any papers they may submit in reply to any opposition filed.

PLEASE TAKE FURTHER NOTICE that a Proposed Form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that Samsung requests oral argument of this motion.

Dated: June 25, 2012

Respectfully,



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